

STATE OF CONNECTICUT

DEPARTMENT OF ENVIRONMENTAL PROTECTION



July 10, 2001

Lauren Levine, Senior Project Manager
United Technologies Corporation
United Technologies Building
Hartford CT 06101

Pratt & Whitney
CTD990672081
R-9
RDMS # 100159

Re: Pratt & Whitney, Willow Brook and Willow Brook Pond; East Hartford, CT



RDMS DocID 00100159

Dear Ms. Levine:

The Permitting, Enforcement & Remediation Division of the Bureau of Water Management ("the Department") has reviewed the following plans which were prepared by Loureiro Engineering Associates, Inc. on behalf of United Technologies Corporation, Pratt & Whitney Division:

- "Remedial Action Work Plan, United Technologies Corporation, Pratt & Whitney, Willow Brook and Willow Brook Pond, East Hartford, Connecticut", dated November 2000, revised May 2001;
- "Request for Variance, Engineered Control of Polluted Soils, Pratt & Whitney, Willow Brook and Willow Brook Pond, East Hartford, CT", dated January 2001, revised May 2001.

The plans propose actions to remediate sediment and soil polluted with PCBs in Willow Brook and in a wetlands area and two ponds associated with the brook in East Hartford, Connecticut.

The Department has the following comments:

Remedial Action Work Plan

1. Section 2.0, Statement of Work, second paragraph, last sentence; also section 2.3.5., Site Restoration, second paragraph: These sections should state "Environmental Land Use Restriction", not "deed restriction".
2. Section 2.3.2, Demolition and Removal of Existing Structures; also Request for a Variance, section 3.2.1. Process Water Buildings: The plan proposes to remove soil and sediment below the process water buildings to a standard of 25 ppm PCBs. This is not acceptable because an engineered control is not proposed to be placed in those areas. A numeric cleanup standard appears to be necessary for the surfaces of related structures. The buildings and components associated with the process water buildings are not depicted as being within the limits of the remediation project. (Drawing 1-1.)
3. Section 2.3.2, Demolition and Removal of Existing Structures: Former Oil-Water Separator (also section 4.2.2, Post-Excavation Confirmatory Sampling) Please clarify that confirmation samples will also be analyzed for PCBs to determine compliance with the 25 ppm cleanup level for soil in the former oil-water separator area.

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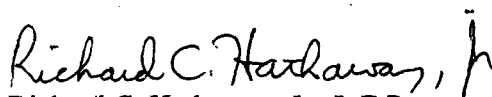
4. Section 4.2.2, Post-Excavation Confirmatory Sampling, PCB Confirmatory Soil Sampling: Composite sampling is not acceptable to confirm attainment of the 1 ppm cleanup standard which applies to areas outside the engineered control.
5. Table 4-3, Required Containers, Preservatives, and Analysis: TPH should be added to Table 4-3.
6. Section 5.0, Quality Assurance Project Plan, Table 5-1: The extractable TPH method is preferred over EPA Method 418.1. TPH should be added to the list of parameters in sections 5.1.4, 5.1.6, and 5.3.4.
7. Appendix D, Dust Control Plan: There must be an action level for respirable particulate matter of 150 micrograms per cubic meter. Continuous monitoring is required around the perimeter of the work area during dry conditions.

Request for Variance, Engineered Control of Polluted Soils

8. Section 4.6, Public Notice (also Remedial Action Work Plan, Section 2.2.1, Project Permits and Approvals, Connecticut Department of Environmental Protection): Verification of public notice of the request to use an engineered control must be submitted, with a written verification that no comments were received within the 30 day period after the public notice.
9. Appendix D, Post-Remediation Groundwater Monitoring Plan, Figure 1: The well locations should be clarified. There appear to be 12 locations shown, not 13 as noted in the plan, and it is not clear which locations are within the brook and pond.
10. Appendix E, Post-Remediation Maintenance and Monitoring Program: The plan proposes that there will be annual inspections of the engineered control, at a minimum. This is not sufficient.

Please submit a letter which addresses the above comments, with replacement pages which may be inserted into the plans. If you have any questions, please feel free to contact me at (860) 424-3780.

Sincerely,



Richard C. Hathaway, Jr., L.E.P.
Environmental Analyst 3
Permitting, Enforcement & Remediation Division
Bureau of Water Management

cc: Brian Cutler, P.E., L.E.P., Loureiro Engineering Associates
Juan Perez, U.S. EPA Region 1
Janet Kwiatkowski, DEP PCBs Management Unit
Melissa Toni, DEP Inland Water Resources Division
Michael Dayton, Town of East Hartford



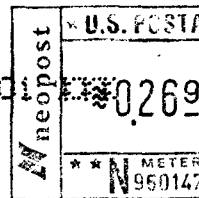
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Department of Environmental Protection

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